IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NORTH CAROLINA CHARLOTTE DIVISION

CASE NO. 3:23-CV-00395

| UNITED STATES OF AMERICA |)) |
|---|--|
| V. |)) |
| ALL CRYPTOCURRENCY, VIRTUAL |) JOINT MOTION TO EXTEND BRIEFING DEADLINES |
| CURRENCY, FUNDS, MONIES, AND OTHER | |
| THINGS OF VALUE SEIZED, PURSUANT TO |) |
| A SEIZURE WARRANT, FROM BINANCE |) |
| AND ASSOCIATED WITH USER ID# |) |
| 17392912, SUCH USER ID ASSOCIATED WITH |) ` |
| THE NAME, VIPIN KUMAR, AND TETHER |) \ |
| DEPOSIT ADDRESS, |)) |
| TCJvnhLCvCwqEzcYiZKbr9F4pkkiLPGzyv; et. | Ó |
| al. |) |

NOW COMES the United States of America, Plaintiff herein, by and through Dena J. King, United States Attorney for the Western District of North Carolina, and Claimant Vipin Kumar, by and through undersigned counsel, and hereby request that this Court extend all briefing deadlines on the pending Motion to Dismiss (Doc. 24) for thirty days so that the parties may exchange certain information in an effort to discuss settlement of this matter. The Parties request that this Court reset the deadline to respond to the Motion to Dismiss to February 10, 2025, and reset the deadline for any reply (if so desired by Claimant) to February 17, 2025.

Respectfully submitted, this, the 10th day of January, 2025.

DENA J. KING UNITED STATES ATTORNEY

s/Benjamin Bain-Creed

FL Bar Number 21436 Assistant United States Attorney Suite 1650, Carillon Building 227 West Trade Street Charlotte, North Carolina 28202 Telephone: (704) 344-6222 Facsimile: (704) 344-6629

Email: benjamin.bain-creed@usdoj.gov

BLANK ROME LLP

By: /s/ Bradley L. Henry
Bradley Henry
BLANK ROME LLP
1271 Avenue of the Americas
New York, NY 10020
bradley.henry@blankrome.com

Attorney for Claimant Vipin Kumar *Admitted Pro Hac Vice*